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13 *Attorney for Plaintiff, Wilmington Trust, National Association, not in its individual capacity but*
14 *as Trustee of ARLP Securitization Trust, Series 2014-2*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WILMINGTON TRUST, NATIONAL
13 ASSOCIATION, NOT IN INDIVIDUAL
14 CAPACITY BUT AS TRUSTEE OF ARLP
15 SECURITIZATION TRUST, SERIES 2014-2,
16 a Federal Savings Bank,

17 Plaintiff,

18 vs.

19 COMMONWEALTH LAND TITLE
20 INSURANCE COMPANY,

21 Defendant.

Case No.: 2:18-cv-02023-GMN-BNW

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF NO. 83]**

(Second Request)

22 COMES NOW, Plaintiff, Wilmington Trust, National Association, not in its individual
23 capacity but as Trustee of ARLP Securitization Trust, Series 2014-2 (“Wilmington Trust”) and
24 Defendant, Commonwealth Land Title Insurance Company (“Commonwealth”), by and through
25 their respective undersigned counsels, stipulate and agree as follows:

- 26 1. On March 12, 2024, Commonwealth filed a Motion to Dismiss [ECF Nos. 83];
- 27 2. Wilmington Trust’s deadline to respond to Commonwealth’s Motion to Dismiss is
28 currently April 9, 2024 following an initial extension granted by this Court [ECF No.
88];

- 1 3. Since the initial extension, on April 4, 2024, the Ninth Circuit Court of Appeals issued
2 a memorandum decision in *Wells Fargo Bank, N.A. v. Commonwealth Land Title*
3 *Insurance Company*, Ninth Cir. Case No. 19-16181 (District Court Case No. 2:18-
4 CV-00494-APG-BNW) (“*Wells Fargo*”). Wilmington Trust requires additional time
5 to assess any potential impact of *Wells Fargo* on this matter;
- 6 4. Accordingly, good cause exists to grant a one-week extension up to and including
7 April 16, 2024 for Wilmington Trust to file its response to Commonwealth’s Motion
8 to Dismiss;
- 9 5. Counsel for Commonwealth does not oppose the requested extension;
- 10 6. This is the second request for an extension and is made in good faith and not for
11 purposes of undue delay or prejudice.

12 **IT IS SO STIPULATED.**

13 DATED this 9th day of April, 2024.

DATED this 9th day of April, 2024.

14 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN KARGER LLP

15 /s/ Yanxiong Li, Esq.

/s/ Kevin S. Sinclair, Esq.

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Attorneys for Plaintiff, Wilmington Trust,

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National Association, not in its individual

Land Title Insurance Company

capacity but as Trustee of ARLP

Securitization Trust, Series 2014-2

22 **IT IS SO ORDERED.**

23 DATED: April 9, 2024

24 
DISTRICT COURT JUDGE